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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UMG RECORDINGS, INC., et al.,

Plaintiffs,

vs.

RCN TELECOM SERVICES, LLC, et  
al.,

Defendants.

**No. 3:19-cv-17272-MAS-ZNQ**

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION TO DISMISS  
PLAINTIFFS' AMENDED  
COMPLAINT**

TO: ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that on a date and time set by the Court, the undersigned, counsel for Defendant Patriot Media Consulting, LLC (“Patriot”), shall, before the Honorable Michael A. Shipp, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, NJ, move for dismissal of Plaintiffs’ Amended

Complaint in the above-captioned action for the reasons set forth in the accompanying Memorandum of Law.

Pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), Patriot respectfully requests that the Court hold oral argument on this Motion.

Dated: January 21, 2020

/s/Edward F. Behm, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of January, 2020, I caused a copy of the foregoing Notice of Motion to Dismiss Plaintiffs' Amended Complaint to be served upon all counsel of record via ECF notification.

By: /s/ Edward F. Behm  
Edward F. Behm